

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA)
)
) Criminal No. 19-41
)
LARRY J. GOISSE, JR.)

MOTION TO EXTEND TIME FOR FILING PRETRIAL MOTIONS

AND NOW, comes the defendant, Larry J. Goisse, Jr., by his attorney, and with respect to the above captioned matter, he represents the following:

1. Mr. Goisse was arraigned on April 4, 2019, on an Indictment alleging violations of 21 U.S.C. §§841(a)(1) and 841(b)(1)(C).

2. Pursuant to Local Rule 12, and prior Court Order, certain types of pretrial motions are due on January 21, 2020.

3. Additional time is needed to conduct discovery, plea negotiations, client consultation and investigation of the facts and law before Mr. Goisse can make an informed decision concerning the filing of pretrial motions.

4. Assistant United States Attorney Robert Cessar has no objection to the relief sought herein.

WHEREFORE, the defendant, Larry J. Goisse, Jr., requests that the deadline for filing pretrial motions be extended for 60 days until March 23, 2020.

Respectfully submitted,

s/ Thomas Livingston
Thomas Livingston
Assistant Federal Public Defender
Attorney ID No. 36949